

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of San Diego Gas and Electric
Company (U 902E) for Approval of SB350
Transportation Electrification Proposals.

Application 17-01-020
(Filed January 20, 2017)

And Related Matters.

Application 17-01-021
Application 17-01-022

**REPLY BRIEF OF GREENLOTS ON THE PRIORITY REVIEW PROJECT
APPLICATIONS OF SAN DIEGO GAS AND ELECTRIC COMPANY, SOUTHERN
CALIFORNIA EDISON COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY**

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Dated: July 10, 2017

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Pursuant to Rule 13.11 of the Commission’s Rules of Practice and Procedure, and the April 13, 2017 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges, Greenlots submits this modest reply brief on the priority review proposals filed by the investor owned utilities in A.17-01-020, et al.

I. INTRODUCTION

Greenlots is a leading provider of grid-focused electric vehicle charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots’ smart charging solutions are built around an open standards based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads. By communicating with hardware through an open communication protocol, the Greenlots’ software platform is able to be paired with a wide range of hardware options, with a focus on protecting the hardware investments made by our partners and clients, and maximizing site host choice.

Greenlots appreciates the broad set of comments and perspectives offered in parties' responses, protests, and opening briefs. Greenlots is encouraged by the growing number of stakeholders participating in this process before the Commission.

II. COMMENTS

Greenlots believes the questions before the Commission with regard to the utilities' proposed Priority Review Projects "PRPs," are relatively narrow, even if there are new types of program designs and concepts being proposed.

Fundamentally, rather than programs, the PRPs specifically are designed to be projects, and even further, pilot projects. These projects are designed to help the utilities, Commission, and indeed, all stakeholders deepen their respective experience and understanding of electric vehicle charging, to help inform future planning and program development and execution, and ultimately to grow the market for EV charging services and through that market, EV adoption.

While arguably moot in the narrowness of the Commission's review, utility ownership of charging infrastructure, especially in San Diego Gas and Electric Company's PRPs, elicited a strong reaction by some parties, despite the poor business model for owning charging stations, and the limited scope of the PRPs and the Commission's review.

Greenlots supports all of the PRPs filed by the utilities, including those involving utility ownership. While some PRPs are likely to prove more valuable than others, the PRPs filed by the utilities represent a broad, innovative set of opportunities to learn and experiment with technologies, rates, and behavior. These are all key elements of helping inform grid planning, customer engagement, and scaling the market to create opportunity for all market participants.

With specific regard to utility ownership of charging infrastructure, Greenlots believes this an appropriate role for the utility broadly at this stage of the market. Indeed, gaining

experience as an owner-operator may be one of the most critical learnings obtained by utilities through the PRPs, and better position the utilities to help grow and scale the market and improve the economics of deployed and future private business models.

Respectfully submitted,

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